

Carlos J. Cuevas, Esq.
Attorney for Debtor
1250 Central Park Avenue
Yonkers, New York 10704
Tel. No. 914.964.7060
Carlos J. Cuevas

Hearing Date: 2/25/20 @ 11:00 AM

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re

Chapter 7

SEAN M. DUNN,

Case No. 18-36566(CGM)

Debtor.

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NOTICE OF MOTION

MADAMS/SIRS:

PLEASE TAKE NOTICE, that upon the Motion to Vacate Order Granting Limited Relief from the Automatic Stay to Conclude State Court Litigation and Reimposing the Automatic Stay of Sean M. Dunn dated February 4, 2020 and upon all the proceedings had herein the undersigned will move before the Hon. Cecelia G. Morris, Chief United States Bankruptcy Judge for the Southern District of New York, United States Bankruptcy Court, 355 Main Street, Poughkeepsie, New York 12601 on February 25, 2020 at 11:00 AM or soon thereafter as counsel can be heard for an Order pursuant to Bankruptcy Code Sections 105(a) and 362(a); Federal Rule of Bankruptcy Procedure 9024; and Federal Rule of Civil Procedure 60(b)(6) vacating the Order Granting Limited Relief from the Automatic Stay to Conclude State Court Litigation dated March 22, 2019; staying LAK3, LLC from prosecuting against Mr. Sean M. Dunn an action

entitled *LAK3, LLC - v. - Sean Dunn et al* , Index No. 61510/2017, Supreme Court of the State of New York, County of Westchester; and such other and further relief as this Court deems just and equitable.

PLEASE TAKE FURTHER NOTICE, that opposition papers, if any, must be served at least seven days prior to the return date of this Motion.

Dated: Yonkers, New York
February 4, 2020

CARLOS J. CUEVAS, ESQ.
Attorney for Debtor
SEAN M. DUNN

By: /s/ Carlos J. Cuevas
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